

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA)

Cr. No. 05-189 (JDB)

v.)

MICHAEL JACKSON)

DEFENDANT’S PROPOSED VOIR DIRE

Michael Jackson, by and through his attorney, Lara G. Quint, Assistant Federal Public Defender, hereby respectfully requests that the following questions be added to the Court’s list of standard voir dire questions and included among those asked of potential jurors during the voir dire process.

1. This case involves an individual who has previously been convicted of a crime that carries a potential term of imprisonment of greater than one year. Do any of you feel that, because of Mr. Jackson’s prior conviction, he is more likely than any other person to have possessed a gun? The only relevance of Mr. Jackson’s prior conviction is for purposes of determining whether he falls into the category of individuals who are covered by the federal statute prohibiting possession of a firearm. You will be specifically instructed by the Judge that this prior conviction should not be considered by you for purposes of determining whether or not Mr. Jackson possessed a firearm on March 8, 2005. Do any of you feel you would not be able to follow this instruction?

2. This case involves the alleged possession of a firearm and of ammunition. Does

anyone have such strong feelings about firearms that the nature of the charges would make it difficult for you to be fair and judge this case on the evidence presented in court? For example, would any of you have difficulty serving on a jury and presuming Mr. Jackson or Ms. Mason to be innocent of such a charge?

3. Are any of you members of any group that advocates either for or against gun ownership or gun control or limitations on the possession of firearms?

Respectfully submitted,

A.J. KRAMER
Federal Public Defender

/s/

LARA G. QUINT
Assistant Federal Public Defender
625 Indiana Avenue, N.W., Suite 550
Washington, DC 20004
(202) 208-7500
